

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

|                           |   |                              |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, | ) |                              |
|                           | ) |                              |
| Plaintiff,                | ) |                              |
|                           | ) | Case No. 4:13CR197 CDP (TCM) |
| vs.                       | ) |                              |
|                           | ) |                              |
| EXCEDRIN COLLINS,         | ) |                              |
|                           | ) |                              |
| Defendants.               | ) |                              |

**DEFENDANT'S MOTION FOR BOND REDUCTION**

COMES NOW Defendant, Excedrin Collins, and hereby requests this honorable Court enter an order reducing his required bond to \$14,000, 10% cash authorized. In support of said request, Counsel for Defendant states as follows:

1) Defendant Collins is presently charged with (1) conspiracy to commit robbery; (2) possession of a firearm in furtherance of a crime of violence; and (2) assault/interfering with a federal agent. *See* Superseding Indictment, on file with this Court.

2) On June 4, 2013, the assigned Magistrate Court entered its Order setting bail at \$25,000- appearance bond- to be secured by \$2500.00 cash with the Court's registry. *See* Order, on file with this Court.

3) Defendant Collins's family has only a limited amount of financial resources from which to utilize for Collins and therefore cannot meet the current \$25,000 bond requirement either in property, cash, or a combination of both. However, Defendant Collins's family is prepared to secure Defendant Collins's release with payment of \$1400.00 in cash, or 10% of \$14,000. Defendant Collins's family is unable to secure additional funds.

4) Defendant Collins has been fully apprised of the legal repercussions of failing to respond to Court for the various proceedings set in this matter.

5) Counsel for Defendant Collins has attempted to contact the assigned prosecuting attorney, AUSA Cristian Stevens, regarding this request. However, these attempts have met with negative results.

6) Counsel for Defendant Collins has also contacted the assigned Pretrial Services Officer, Chauncey Hunter, who advised that his office would not oppose the requested bond reduction with the condition that Defendant Collins agree to provide a viable address for purposes of establishing residency, or otherwise reside at the address previously provided and/or a designated phone line for electronic monitoring.

7) In order to obtain the requested bond, Defendant Collins would agree to electronic monitoring and/or a request that an appropriate family member agree to third-party custody in order to alleviate any concerns regarding his appearance in Court.

WHEREFORE Defendant, Excedrin Collins, requests this honorable Court grant her request for a reduction in Collins and thereby authorize payment of \$1400.00 or 10% of \$14,000 in order to secure her release pending sentencing.

Respectfully Submitted,

THE LAW OFFICES OF JOHN M. LYNCH, LLC.

/s/ John M. Lynch

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**Certificate of Service**

I hereby certify that on November 6, 2013, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon:

Christian Stevens  
Assistant United States Attorney  
Thomas F. Eagleton Courthouse, 20<sup>th</sup> Floor  
111 South Tenth Street  
St. Louis, MO 63102

E/S John M. Lynch